

**ROBERT G. BERNHOFT, ESQ**  
Wisconsin Bar No. 1032777  
**THE BERNHOFT LAW FIRM, S.C.**  
1402 E. Cesar Chavez Street  
Austin, Texas 78702  
(512) 582-2100 telephone  
(512) 373-3159 facsimile  
[djtreuden@bernhoftlaw.com](mailto:djtreuden@bernhoftlaw.com)

**JOEL F. HANSEN, ESQ.**  
Nevada Bar No. 1876  
**HANSEN & HANSEN, LLC**  
9030 W. Cheyenne Avenue, #210  
(702) 906-1300 office  
(702) 366-1857: facsimile  
[efile@hansenlawyers.com](mailto:efile@hansenlawyers.com)

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED )  
TELEPHONY CONSULTANTS, MRZ )  
MANAGEMENT, LLC, DONOR )  
RELATIONS, LLC, TPFE, INC., )  
AMERICAN TECHNOLOGY SERVICES, )  
COMPLIANCE CONSULTANTS, )  
CHROME BUILDERS CONSTRUCTION, )  
INC., and UNIFIED DATA SERVICES, )  
Plaintiffs, )  
v. )  
BANK OF AMERICA, N.A. and JOHN )  
and JANE DOES 1-100, )  
Defendants. )

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND  
DEADLINE TO RESPOND TO  
DEFENDANT'S OBJECTION TO  
MAGISTRATE JUDGE'S ORDER [ECF  
NO. 192]  
(Sixth Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and IB 3-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the “Plaintiffs”), and the Defendant Bank of America (hereinafter “BOFA”), by and through their respective attorneys of record, hereby jointly stipulate to extend the briefing schedule for the Plaintiffs to file a response to the Defendant’s Objection to the Magistrate Judge’s Order. (Docs. 192 and 200.) This is the sixth stipulation requesting an extension of time to extend the deadline to

respond to the Defendant’s Objection. (Doc. 200.) Plaintiffs’ response to Defendant’s Objection was originally due November 18, 2021. Prior stipulations extended the deadline to December 1, 2021, then to December 6, 2021, then to December 15, 2021, then to December 30, 2021, and a current due date of January 11, 2022. (Docs. 211, 217, 227, 230, and 242.) This request seeks an extension to January 25, 2022. In support thereof, the Plaintiffs and BOFA represent as follows:

This stipulation for an extension is not intended to cause undue delay. Every attorney and paralegal at the Bernhoft Law Firm save one has now fallen ill with either the flu or COVID-19 over the past two weeks, and the Firm's offices were closed last week. Attorney Bernhoft (undersigned Plaintiffs' counsel) is lead drafter on this response brief. He fell ill over the New Year's weekend and is still being treated for both flu and COVID-19. For these reasons, the Plaintiffs require an extension of time to file their response to BOFA's objections to this Court's Rule 30(b)(6) order.

Plaintiffs' counsel contacted BOFA's counsel and discussed extending the briefing deadline. Based on those discussions, the Parties stipulate to extend the deadline for Plaintiffs to respond to BOFA's Objection to the Magistrate Judge's Order to January 25, 2022. The Parties agree that the foregoing constitutes good cause to extend the briefing schedule deadlines.

## **IT IS SO STIPULATED.**

Dated: January 10, 2022  
THE BERNHOFT LAW FIRM, S.C.

Dated: January 10, 2022  
SNELL & WILMER, L.L.P.

/s/ Robert G. Bernhoft  
Robert G. Bernhoft, Esq.  
Wisconsin Bar No. 1032777  
1402 E. Cesar Chavez Street  
Austin, Texas 78702

Attorney for Plaintiffs  
Appearing *pro hac vice*

/s/ Blakeley E. Griffith  
Amy F. Sorenson (NV Bar 12495)  
Blakeley E. Griffith, Esq. (NV Bar 12386)  
Holly E. Cheong (NV Bar 11936)  
3883 Howard Hughes Pkwy, Ste. 1100  
Las Vegas, Nevada 89169

*Attorneys for Bank of America, N.A.*

## IT IS SO ORDERED:

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**RICHARD F. BOULWARE, II**  
United States District Judge

DATED this 11th day of January, 2022.

1 IT IS SO ORDERED:  
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5 UNITED STATES DISTRICT COURT JUDGE

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**Certificate of Service**

I hereby certify that on January 10, 2022, I electronically filed and served the foregoing third JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT'S OBJECTION TO MAGISTRATE JUDGE'S ORDER [ECF NO. 192] with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Robert G. Bernhoff

**Robert G. Bernhoft  
Attorney for Plaintiffs**